# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NUMBER: 10-11576 ESI
NELSON RODRIGUEZ ORTIZ	CHAPTER 13
DEBTOR(S)	

### PROPOSED AMENDMENT TO CHAPTER 13 PLAN

#### TO THE HONORABLE COURT:

**COME(S)** NOW **DEBTOR**(S), represented by the undersigned counsel and very respectfully **ALLEGE(S)** and **PRAY(S)** as follows:

1. Debtor(s) intend(s) to amend the Chapter 13 Plan for the following reason:

# TO INCREASE PLAN BASE SO IT COVERS DEPARTMENT OF TREASURY PRIORITY DEBT.

**WHEREFORE**, it is respectfully requested of this Honorable Court to approve the above indicated amendment.

**IN SAN JUAN, PUERTO RICO**, this 8<sup>th</sup> day of February of 2011.

**I HEREBY CERTIFY**: that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to United States Trustee, Mr. Jose R Carrion, Chapter 13 Trustee, and we sent copy of this document through regular mail to Debtor(s) and all non-CM/ECF participant interested parties to their address listed on the master address list.

/s/LUIS J CUEVAS FONTAN
ATTORNEY FOR DEBTOR
USDC PR 226806
P.O. Box 195143
San Juan, Puerto Rico 00919-5143
Tel (787) 767-9174
Fax(787) 767-9178
ljcuevasesq@yahoo.com

#### **United States Bankruptcy Court District of Puerto Rico**

IN RE:		Case No. <u>10-11576-13</u>
RODRIGUEZ ORTIZ, NELSON		Chapter 13
·	Debtor(s)	

#### AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.

2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

□ PRE □ POST-CONFIRMATION  I. PAYMENT PLAN SCHEDULE	Filed by: ☑ Debtor ☐ Trustee ☐ Other	
I. PAYMENT PLAN SCHEDULE	· · · · · · · · · · · · · · · · · · ·	
	II. DISBURSEMENT SCHEDULE	
\$	A. ADEQUATE PROTECTION PAYMENTS OR \$ B. SECURED CLAIMS:  ☑ Debtor represents no secured claims.  ☐ Creditors having secured claims will retain their liens and shall be paid as follows:  1. ☐ Trustee pays secured ARREARS:	
\$ x = \$ PROPOSED BASE: \$ <b>6,125.00</b>		
III. ATTORNEY'S FEES (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$	D. UNSECURED CLAIMS: Plan  Classifies  Does not Classify Claims.  1. (a) Class A:  Co-debtor Claims / Other:  Cr.  Cr.  Cr.  Cr.  Cr.  #  #  #  #  #  S  S  S  S  C. Unsecured Claims otherwise receive PRO-RATA disbursements.	
Signed: /s/NELSON RODRIGUEZ ORTIZ Debtor  Joint Debtor	OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) ATTORNEY FEES WILL BE PAID BEFORE TAXES AND CREDITORS.DEBTOR AGREES TO LIFT THE STAY IN FAVOR OF BPPR FOR HOME MORTGAGE ACCT #0000577040, AND IN FAVOR OF FORD MOTOR CREDIT AUTO LOAN #4009 ((NISSAN PATHFINDER 1999)	
Ioint Debtor		

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE: CASE NUMBER: 10-11576 ESL

NELSON RODRIGUEZ ORTIZ CHAPTER 13

DEBTOR(S)

### NOTICE OF FILING AMENDED PLAN

TO ALL THE CREDITORS LISTED ON THE ATTACHED MASTER ADDRESS LIST

NOTICE IS HEREBY GIVEN THAT DEBTOR(S) FILED THE ATTACHED PROPOSED AMENDED PLAN ON February 8, 2011

PARTIES IN INTEREST ARE NOTIFIED THAT THEY HAVE TWENTY (20) DAYS

TO REJECT A PROPOSED AMENDED PLAN AND REQUEST A HEARING.

ABSENT GOOD CAUSE, UNTIMELY REJECTIONS SHALL BE DENIED.

### **CERTIFICATE OF SERVICE**

IS HEREBY CERTIFY THAT THE PARTIES SERVED ARE THOSE MENTIONED ON THE ATTACHED MASTER ADDRESS LIST.

IN SAN JUAN, PUERTO RICO, this 8<sup>th</sup> day of February of 2011.

/s/LUIS J CUEVAS FONTAN

Attorney for Debtor USDC PR 226806 P.O. Box 19-5143 San Juan, Puerto Rico 00919-5143 Tels. (787)767-9174 Fax (787)767-9198

ljcuevasesq@yahoo.com

RODRIGUEZ ORTIZ, NELSON CALLE 10 # JA4 ALTURAS DE CANA BAYAMON, PR 00957 SANTANDER FINANCIAL PO BOX 362589 SAN JUAN, PR 00936-2589

Luis J. Cuevas-Fontan PO Box 195143 San Juan, PR 00919-5143 WESTERNBANK PO BOX 430 MAYAGUEZ, PR 00681-0430

BPPR PO BOX 70100 SAN JUAN, PR 00936-8100

COMMOLOCO PO BOX 41012 MINILLAS STATION SAN JUAN, PR 00940

DEPT OF TEASURY PO BOX 9024140 SAN JUAN, PR 00902-4140

FORD MOTOR CREDIT PO BOX 537901 LIVONIA, MI 48153

METLIFE PO BOX 6171 UTICA, NY 13504-6171

NCO PTM/22 507 PRUDENTIAL RD HORSHAM, PA 19044

ONELINK COMMUNICATIONS PO BOX 192296 SAN JUAN, PR 00918-2296

RG PREMIER BANK PO BOX 2510 GUAYNABO, PR 00970